

November 27, 2018

**Via SCPSC E-FILING DMS**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, SC 29210

**Re: Application of Duke Energy Carolinas, LLC for Adjustments in Electric Rate  
Schedules and Tariffs and Request for an Accounting Order;  
Docket No. 2018-319-E**

Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission ("Commission") a copy of the Petition to Intervene of Walmart Inc. ("Walmart"), in the above-referenced case. By copy of this letter, I am serving all parties of record via Electronic Mail and First-Class Mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By



Stephanie U. Eaton (SC Bar No. 80073)  
Carrie M. Harris

Derrick Price Williamson  
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*Counsel to Walmart Inc.*

SUE/sds  
Attachments  
c: Certificate of Service

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2018-319-E

IN RE: Application of Duke Energy	)	<b>PETITION TO INTERVENE OF</b>
Carolinas, LLC for Adjustments in Electric	)	<b>WALMART INC.</b>
Rate Schedules and Tariffs and Request for an	)	
Accounting Order	)	

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Pursuant to Rule 103-825 and other applicable rules and regulations of the South Carolina Public Service Commission ("Commission"), Walmart Inc. ("Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On November 8, 2018, Duke Energy Carolinas, LLC ("DEC" or "Company"), filed an Application for adjustments in electric rate schedules and tariffs and request for an accounting order ("Application"). The Application was filed pursuant to S.C. Code Ann. §§ 58-27-820 and 58-27-870, and S.C. Code Ann. Regs. 103-303 and 103-823, the Rules of Practice and Procedure of the Public Service Commission of South Carolina. The Application requests an increase of approximately \$168 million (or 10 percent) in its retail revenues to be effective June 1, 2019. The Company's Application also requests Commission approval of additional rate changes and other proposals.

2. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2001 SE 10<sup>th</sup> Street, Bentonville, AR 72716-0550.

3. Walmart has the privilege of providing its retail services in the State of South Carolina. Walmart is a large commercial customer of DEC. Walmart has 30 retail stores and related facilities, one return center and one distribution center in South Carolina that are served by DEC. Walmart purchases approximately 118 million kWh annually from DEC. Electricity is one of the largest operating costs faced by Walmart. As a result, any modification to DEC's electric rates and terms of service has the potential to substantially impact Walmart's operations in South Carolina.

4. Walmart has a direct and substantial interest in the outcome of this proceeding. In addition, as a large commercial customer that purchases substantial amounts of electric and related services from the Company pursuant to multiple accounts at multiple locations, Walmart has an interest in this proceeding that is not represented by any other party.

5. The attorneys representing Walmart in this proceeding are:

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 Carrie M. Harris  
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Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson and Ms. Harris be added to the service list as Walmart may seek Mr. Williamson's and/or Ms. Harris' admission to appear before the Commission *pro hac vice* in the near future.

5. This Petition to Intervene is timely filed as interventions are due by December 27, 2018, per Notice of the Commission.

**WHEREFORE**, Walmart Inc., respectfully requests that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 

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*Counsel to Walmart Inc.*

Dated: November 27, 2018

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2018-319-E

IN RE: Application of Duke Energy )  
Carolinas, LLC for Adjustments in Electric )  
Rate Schedules and Tariffs and Request for an )  
Accounting Order )

**CERTIFICATE OF SERVICE**


I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and First-Class Mail:

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Stephanie U. Eaton (SC Bar No. 80073)

Dated: November 27, 2018